

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	Criminal No. 2:21-cr-00242-WSH
)	
vs.)	Filed Electronically
)	
ZACKARY WOZNICHAK,)	
)	
Defendant.)	The Honorable W. Scott Hardy

MOTION TO TRAVEL

AND NOW, comes the Defendant, Zackary Woznichak, by and through his attorney, Lee M. Rothman, Esquire and the law firm of Difenderfer, Rothman, Haber and Mancuso, and files this Motion to Travel as follows:

1. On May 26, 2021, an Indictment was filed, charging Mr. Woznichak in the above-captioned matter.
2. On June 4, 2021, Mr. Woznichak was arraigned and granted an unsecured bond of \$10,000.
3. The above-captioned matter is currently scheduled for a Status Conference on July 18, 2024 before this Honorable Court.
4. Mr. Woznichak is an amateur boxer, who trains with the Rising Stars Boxing Team.
5. Mr. Woznichak, through Rising Stars, has a boxing match scheduled in Hilliard, Ohio from June 15 to June 16. This boxing match is organized and sanctioned through USA Boxing.
6. Specifically, the boxing match is occurring at 4100 Columbia Street, Hilliard, OH 43026.

7. Mr. Woznichak will be traveling by vehicle with the Rising Stars Team, leaving Pittsburgh at 10:00 p.m. on June 14, 2024.
8. Mr. Woznichak will arrive in Hilliard, Ohio around 2:00 a.m. on June 15, 2024, where he and the Team will warm up and participate in their matches. The matches are scheduled from 6:00 p.m. on June 15 to 12:00 a.m. on June 16.
9. After the matches end at around 12:00 a.m. on June 16, 2024, Mr. Woznichak will be returning to Pittsburgh by vehicle, and will arrive in Pittsburgh at approximately 4:00 a.m.
10. Finally, Counsel has conferred with Assistant U.S. Attorney Jonathan Lusty, who consents to this travel request.

WHEREFORE, the Defendant respectfully requests that this Honorable Court grant the above request and allow him to travel to Hilliard, Ohio from June 14 – June 16, 2024 for his boxing match.

Respectfully submitted,

s/ Lee M. Rothman
Lee M. Rothman, Esquire
PA I.D. No. 77445

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Dated: June 13, 2024

Attorney for Defendant, Zackary Woznichak